

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY,  
TENNESSEE, et al.,**

**Defendants.**

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**DECLARATION OF VANESSA BAEHR-JONES**

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. Attached hereto as **Exhibit 1** is a true and correct copy of a letter from the District Attorney General for the First Judicial District, Steven Finney, to the local news station WJHL on July 3, 2024.

This document was executed in Johnson City, Tennessee. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and based upon my own personal knowledge, and that if called upon to testify, I could verify the accuracy of the same.

This is the 9<sup>th</sup> day of August 2024.

/s/ Vanessa Baehr-Jones  
VANESSA BAEHR-JONES

## CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on August 9, 2024 to counsel of record:

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/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones